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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

LIGHTSQUARED INC., *et al.*,

Debtors.

SANJIV AHUJA,

Appellant,

v.

LIGHTSQUARED INC., *et al.*,

Appellees.

Chapter 11

Case No. 12-12080 (SCC)

Jointly Administered

No. 15-cv-2342 (KBF)

**NOTICE OF APPELLANT SANJIV AHUJA'S
MOTION FOR STAY PENDING APPEAL**

PLEASE TAKE NOTICE on a date and time to be set by this Court, appellant Sanjiv Ahuja will move, pursuant to Federal Rules of Bankruptcy Procedure 8007 or 8025(b), for an order staying Bankruptcy Judge Shelley C. Chapman's March 27, 2015 order ("Confirmation Order") confirming the modified second amended joint chapter 11 plan of appellees LightSquared Inc. and its debtor subsidiaries pending this Court's ruling on Mr. Ahuja's appeal and, if unsuccessful, Mr.

Ahuja's appeal of the Confirmation Order to the Court of Appeals for the Second Circuit. In support of this motion, Mr. Ahuja relies upon the memorandum of law and declaration of Avery Samet in support of the same, filed contemporaneously herewith.

Dated: July 20, 2015
New York, New York

STORCH AMINI & MUNVES PC

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